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**From:** Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]  
**Sent:** 4/8/2019 8:06:30 AM  
**To:** Malloy, Ruth [malloy.ruth@epa.gov]  
**Subject:** Pls print for me & create Folder FIFRA 24(c)  
**Attachments:** AAPCO 24(c) Letter Final April 4 2019.pdf; ATT00001.htm

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, DC

Sent from my iPhone

Begin forwarded message:

**From:** "Keigwin, Richard" <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Date:** April 4, 2019 at 12:41:48 PM EDT  
**To:** "Dunn, Alexandra" <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>, "Beck, Nancy" <[Beck.Nancy@epa.gov](mailto:Beck.Nancy@epa.gov)>, "Baptist, Erik" <[Baptist.Erik@epa.gov](mailto:Baptist.Erik@epa.gov)>, "Bertrand, Charlotte" <[Bertrand.Charlotte@epa.gov](mailto:Bertrand.Charlotte@epa.gov)>  
**Cc:** "Keller, Kaitlin" <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>, "Dinkins, Darlene" <[Dinkins.Darlene@epa.gov](mailto:Dinkins.Darlene@epa.gov)>, "Messina, Edward" <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>, "Miller, Wynne" <[Miller.Wynne@epa.gov](mailto:Miller.Wynne@epa.gov)>  
**Subject:** Fwd: Letter from AAPCO BOD: Concerns regarding the notification: Guidance on FIFRA 24(c) Registrations

FYI. We will be working on a response.

I am meeting with AAPCO leadership when they are in town next week.

Rick Keigwin  
Director, Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: 703-305-7090  
Website: [www.epa.gov/pesticides](http://www.epa.gov/pesticides)  
Sent from my iPhone

Begin forwarded message:

**From:** Rose Kachadoorian <[rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)>  
**Date:** April 4, 2019 at 10:20:36 AM EDT  
**To:** "Keigwin, Richard" <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Cc:** Leo Reed <[reedla@purdue.edu](mailto:reedla@purdue.edu)>, Derrick Lastinger <[derrick.lastinger@agr.georgia.gov](mailto:derrick.lastinger@agr.georgia.gov)>, "Jones, Patrick" <[patrick.jones@ncagr.gov](mailto:patrick.jones@ncagr.gov)>, Cary Giguere <[Cary.Giguere@vermont.gov](mailto:Cary.Giguere@vermont.gov)>, Megan Patterson <[Megan.L.Patterson@maine.gov](mailto:Megan.L.Patterson@maine.gov)>, Liza Fleeson <[Liza.Fleeson@vdacs.virginia.gov](mailto:Liza.Fleeson@vdacs.virginia.gov)>, "tdrake@clemson.edu"

<[tdrake@clermson.edu](mailto:tdrake@clermson.edu)>, "GBahr@agr.wa.gov" <[GBahr@agr.wa.gov](mailto:GBahr@agr.wa.gov)>, Jeffrey Rogers <[jeffrey.rogers@vdacs.virginia.gov](mailto:jeffrey.rogers@vdacs.virginia.gov)>, Amy Sullivan <[aapco.sfireg@gmail.com](mailto:aapco.sfireg@gmail.com)>

**Subject: Letter from AAPCO BOD: Concerns regarding the notification: Guidance on FIFRA 24(c) Registrations**

Rick,

Attached is a letter provided to the US EPA by the AAPCO Board of Directors (BOD), on behalf of the members of AAPCO.

This letter concerns the notification posted on the Guidance on FIFRA 24(c) Registrations website on 03/19/19. According to the notification, EPA is now re-evaluating its approach to reviewing 24(c) requests and the circumstances under which it will exercise its authority to disapprove those requests.

The AAPCO BODs considers the Section 24(c) process to be currently highly functional, and protective of non-target plants and the environment.

We look forward to working with our EPA partners on this very important issue.

Sincerely,

Rose Kachadoorian  
AAPCO President  
Pesticides Program Manager,  
Registration, Licensing and Certification  
Natural Resource Policy Area  
Oregon Department of Agriculture  
635 Capitol Street NE  
Salem, Oregon 97301  
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Email: [rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)

